

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF PUERTO RICO**

**IN RE:**

**ENRIQUE RODRÍGUEZ NARVÁEZ  
MYRNA I. RIVERA ORTIZ**

**DEBTORS**

**CASE NO. 18-02044 EAG**

**CHAPTER 11**

**MOTION TO INFORM AND REQUEST EXTENSION OF TIME**

**TO THE HONORABLE COURT:**

**COME NOW** Debtors through the undersigned attorney and respectfully requests and prays for the following:

1. On April 16, 2018, Debtors, Enrique Rodríguez Narváez & Myrna I. Rivera Ortiz, filed a voluntary petition for relief pursuant to chapter 11 of the Bankruptcy Code. The plan considers and propose the payments of all creditors, as per confirmed order entered on March 25, 2019.

2. Debtors are in conversations with creditor, Lopez Enterprises Inc, to discuss our proposal of payments.

3. Debtors clarify that the release requested in our motion is for all Debtors' properties in which Creditor, Lopez Enterprises Inc, has recorded a lien of \$85,000.00.

4. Creditor counsel is discussing our proposal with his client to express his determination and in view of the same, Debtor and creditor have initiated conversation to settle their differences and submit an agreement.

5. Creditor counsel, Luis R. Vivas Ugartemendía, has authorized the undersigned attorney to present this motion and request a period of twenty (20) days to resolve their differences and submit an agreement.

6. This transaction benefits and comply with the purpose of the Chapter 11 plan.

7. Debtors request from this Honorable Court to take notice of this motion and grant period of twenty (20) days requested.

**WHEREFORE**, Debtors request from this Honorable Court to take notice of this motion and grant the period of twenty (20) days requested, along with any other relief and proceedings that in accordance to law this court deems just and proper.

**I CERTIFY** that this motion has been electronically filed using CM/ECF system and that a copy of the same was forwarded to the Office of the U.S. Trustee and all other parties in interest, as per the Master Address List.

In Caguas, Puerto Rico, June 1st, 2021.

**VICTOR GRATACÓS DIAZ LAW OFFICE**  
PO BOX 7571  
CAGUAS, PR 00726  
PHONE: (787) 746-4772 & FAX: (787) 746-3633  
EMAIL: bankruptcy@gratacoslaw.com

/s/ Víctor Gratacós-Díaz (127906)